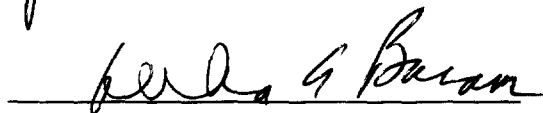


I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

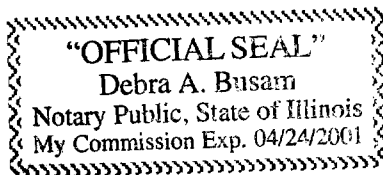


Warren L. Mickens

Subscribed and sworn before me this 3rd of July, 1997.



Notary Public



My Commission expires: _____

SUMMARY OF AMERITECH'S PERFORMANCE MEASUREMENTS FOR INTERCONNECTION

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department Views
(1) Installation intervals for new trunk groups to tandem switches and between end offices. (The Agreement establishes a benchmark of 14 days for provisioning end office trunks ordered by a requesting carrier (or 15 days, if more than 48 trunks are ordered per day, or, if the order is large enough, at an interval to be negotiated).)	AT&T Agreement, Schedule 3.8, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. Although Mr. Friduss does not discuss interconnection performance measures in depth, he notes the importance of installation intervals generally. <u>See</u> Friduss Aff., ¶46 ("Installation interval - an excellent measure of provisioning cycle time and therefore an integral performance parity determinant.") Because Ameritech does not "interconnect" to itself, this measurement constitutes an "adequacy performance measurement." <u>Id.</u> , ¶¶28, 46.
(2) Blocking percentage for exchange access traffic (The Agreement establishes a trunk blocking percentage benchmark for exchange access final trunk group traffic that travels via tandem of 0.5 percent.)	AT&T Agreement, Schedule 3.8, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶65 (suggesting reports on "Blocked Call Attempts"); <u>id.</u> , ¶46 ("Trunk blockage - an excellent measure of network engineering and maintenance").
(3) Blocking percentage for local and intraLATA toll traffic (The agreement establishes a trunk blocking percentage benchmark of one (1) percent.)	AT&T Agreement, Schedule 3.8, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶65 (suggesting reports on "Blocked Call Attempts"); <u>id.</u> , ¶46 ("Trunk blockage - an excellent measure of network engineering and maintenance").
(4) Timely restoral of trunk outages (The Agreement establishes trunk restoral benchmarks of one (1) hour for service affecting outages and 24 hours for non-service affecting outages.)	AT&T Agreement, Schedule 3.8, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. Ameritech's reporting of trunk restoral (within strict intervals) corresponds to Mr. Friduss's requests. <u>See</u> Friduss Aff., ¶46 ("Repair interval - an excellent measure of maintenance cycle time and integral to performance parity determination.")

SUMMARY OF AMERITECH'S PERFORMANCE MEASUREMENTS FOR UNBUNDLED NETWORK ELEMENTS

What Ameritech Measures/Reports	Source of Ameritech's Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(1) Installation intervals for provisioning non-DS1 loops (The agreement establishes as performance benchmarks that most orders of 1-24 loops will be provisioned in 5 days, most orders of 25-48 loops within 6 days, most orders of 49-96 loops within 7 days, and most orders of 97+ loops at an interval to be negotiated.)	AT&T Agreement, Schedule 9.10, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. See Friduss Aff., ¶51 ("UNE loop provisioning intervals - this can be an excellent measure of product specific provisioning cycle time and determinate of performance adequacy," provided "start and stop times [are] defined."); <u>id.</u> ¶¶46, 52, 73 (same); <u>see also id.</u> ¶29 ("[A]dequacy performance measurements apply in "applies-to-oranges" comparisons. An example might be the average time to provision an unbundled loop."); <u>id.</u> ¶41 (same); <u>id.</u> ¶57 (stating that "interval measurements should be based on company offered appointments only."); Mickens Aff., ¶¶38-46 (discussing procedures for starting and stopping the clock).
(2) Interval for provisioning DS1 unbundled local transport (The agreement provides that DS1 unbundled local transport will be provisioned within 7 days when facilities are available, and at negotiated intervals when facilities are unavailable.)	AT&T Agreement, Schedule 9.10, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. In addition to the above citations, see Friduss Aff., ¶46 ("Installation interval - an excellent measure of provisioning cycle time and therefore an integral performance party determinant," provided "agreement [is] reached on stop and start time and appropriate reporting requirements.").
(3) Interval for provisioning DS3 unbundled local transport (The agreement provides that DS3 unbundled local transport will be provisioned at negotiated intervals.)	AT&T Agreement, Schedule 9.10, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. In addition to the above citations, see Friduss Aff., ¶46 ("Installation interval - an excellent measure of provisioning cycle time and therefore an integral performance party determinant," provided "agreement [is] reached on stop and start time and appropriate reporting requirements.").
(4) Interval for provisioning OC-N unbundled local transport (The agreement provides that OC-N unbundled local transport will be provisioned at negotiated intervals.)	AT&T Agreement, Schedule 9.10, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. In addition to the above citations, see Friduss Aff., ¶46 ("Installation interval - an excellent measure of provisioning cycle time and therefore an integral performance party determinant," provided "agreement [is] reached on stop and start time and appropriate reporting requirements.").

What Ameritech Measures/Reports	Source of Ameritech's Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(5) Trouble report rate, measured as a percentage	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶64 ("[Trouble Report Rate] is the key measure of service reliability and, as a historical matter, positively correlates with an end user's perception of their provider."); <u>id.</u> ¶52 (describing "Percent right the first time" as "an excellent measure of provisioning reliability performance").
(6) Mean time to repair	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶64 ("[Mean Time to Repair] is the key measure of trouble report cycle time."); <u>id.</u> , ¶¶46, 57 ("an excellent measure of maintenance cycle time and integral to performance parity determination"); <u>id.</u> , (same).
(7) Percentage of lines out-of-service for over 24 hours	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶51 ("UNE loop out-of-service repair intervals - excellent measure of product specific maintenance cycle time and determinant of performance adequacy.").
(8) Speed of answer - Ordering, measured as a percentage of calls answered in > 10 seconds	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶52 ("Service Center response time - an excellent potential measure of ordering cycle time," provided "response time [is] specifically defined as 'time to speak to the [BOC] representative.'").
(9) Speed of answer - Prov/MTCE, measured as a percentage of calls answered in > 20 seconds	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶64 ("[BOC Service Center Speed of Answer] is an important measure of performance activity, relating to an activity not required by the BOC.").
(10) Firm order confirmations, measured as a percentage provided in > 48 hours	Ameritech Public Commitment	N/A	Yes. See <u>Friduss Aff.</u> , ¶62 ("Firm Order Response Time provided by product, e.g., Resale POTS, UNE Loop Trunk Order - An important adequacy performance measure because it measures whether CLEC service orders are processed in a manner that allows overall provisioning intervals to be at parity.").

What Ameritech Measures/Reports	Source of Ameritech's Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(11) Geographically disaggregated performance information	Ameritech Public Commitment, provided upon request	N/A	Yes. See Friduss Aff., ¶39 ("Geographic market parity means comparing CLEC results to BOC results within the geography the CLEC has chosen to offer service. For example, if a CLEC offers resale service only in city A, a meaningful comparison may require the BOC to provide their retail results only for city A.").

SUMMARY OF AMERITECH'S PERFORMANCE MEASUREMENTS FOR RESALE

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(1) Percentage of POTS (regular or "plain old" telephone service) installation intervals more than 6 days	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶46 ("Installation interval -- an excellent measure of provisioning cycle time and therefore an integral parity determinant.").
(2) Percentage of POTS installed on or before the due date	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent missed due dates - An excellent measure, when tied to provisioning interval, of provisioning cycle time performance. It is critical that this measure is determined with respect to the original due date, rather than a 'new' due date set in response to work force or other delays. Data needs to be gathered and reported by product and market.").
(3) Percentage of missed appointments for HICAP (high capacity service) installations	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent missed due dates - An excellent measure, when tied to provisioning interval, of provisioning cycle time performance. It is critical that this measure is determined with respect to the original due date, rather than a 'new' due date set in response to work force or other delays. Data needs to be gathered and reported by product and market.").

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(4) Percentage of missed appointments for SUBRATE (low speed digital service below 96Kb) installations	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent missed due dates - An excellent measure, when tied to provisioning interval, of provisioning cycle time performance. It is critical that this measure is determined with respect to the original due date, rather than a 'new' due date set in response to work force or other delays. Data needs to be gathered and reported by product and market.").
(5) Percentage of new service failures for POTS during first 7 days from installation date	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent right the first time -- An excellent measure of provisioning reliability performance, if properly gathered and reported in an appropriate format.")
(6) Percentage of new service failures for HICAP during first 30 days from installation date	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent right the first time -- An excellent measure of provisioning reliability performance, if properly gathered and reported in an appropriate format.")
(7) Percentage of new service failures for SUBRATE during first 30 days from installation date	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Percent right the first time -- An excellent measure of provisioning reliability performance, if properly gathered and reported in an appropriate format.")

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(8) Percentage of POTS repairs not completed within 24 hours	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 (noting the importance of "specific cycle time and reliability measurements" to repair service performance); <u>id.</u> , ¶64 (describing "out of Service Offer 24 Hours" as a "typical maintenance performance measure[]" not provided by SWBT").
(9) Percentage of HICAP repairs not completed within 2 hours	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 (noting the importance of "specific cycle time and reliability measurements" to repair service performance); <u>id.</u> , ¶64 (describing "out of Service Offer 24 Hours" as a "typical maintenance performance measure[]" not provided by SWBT").
(10) Percentage of SUBRATE repairs not completed within 3 1/2 hours	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 (noting the importance of "specific cycle time and reliability measurements" to repair service performance); <u>id.</u> , ¶64 (describing "out of Service Offer 24 Hours" as a "typical maintenance performance measure[]" not provided by SWBT").
(11) Percentage of initial trouble reports (failure rate)	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶64 ("[Trouble Report Rate] is the key measure of service reliability and, as a historical matter, positively correlates with an end user's perception of their provider."); <u>id.</u> ¶52 (describing "Percent right the first time" as "an excellent measure of provisioning reliability performance").

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(12) Percentage of outside plant troubles	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶64 ("[Trouble Report Rate] is the key measure of service reliability and, as a historical matter, positively correlates with an end user's perception of their provider."); <u>id.</u> ¶52 (describing "Percent right the first time" as "an excellent measure of provisioning reliability performance").
(13) Percentage of firm order confirmations for switched services not provided within 4 days from date of order	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶¶54, 57, 62.
(14) Percentage of firm order confirmations for HICAP services not provided within 24 hours from time of order	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶¶54, 57, 62.
(15) Percentage of calls to service center made during normal business hours that are not answered within 10 seconds	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶52 ("Service Center response time - an excellent potential measure of ordering cycle time," provided "response time [is] specifically defined as 'time to speak to the [BOC] representative.'").
(16) Percentage of calls to repair center made at any time that are not answered within 20 seconds	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶64 ("[BOC Service Center Speed of Answer] is an important measure of performance activity, relating to an activity not required by the BOC.").
(17) Operator services: toll assistance speed of answer	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶67 (describing Ameritech's Toll and Directory Assistance performance measures as "typical").

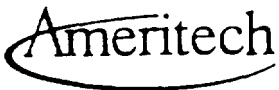
What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(18) Operator services: directory assistance speed answer	AT&T Agreement, Schedule 10.9.2, Section 3.8	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶67 (describing Ameritech's Toll and Directory Assistance performance measures as "typical").
(19) Mean time to repair	Not a contractual obligation, but offered in response to requests of some carriers and shift by MPSC and other commissions to monitoring mean time to repair information	Yes. MPSC April 4 Order, p.5.	Yes. <u>See</u> Friduss Aff., ¶64 ("[Mean Time to Repair] is the key measure of trouble report cycle time."); <u>id.</u> , ¶¶46, 57 ("an excellent measure of maintenance cycle time and integral to performance parity determination"); <u>id.</u> , (same).
(20) Geographically disaggregated performance information	Ameritech Public Commitment, provided upon request	N/A	Yes. <u>See</u> Friduss Aff., ¶39 ("Geographic market parity means comparing CLEC results to BOC results within the geography the CLEC has chosen to offer service. For example, if a CLEC offers resale service only in city A, a meaningful comparison may require the BOC to provide their retail results only for city A.").

SUMMARY OF AMERITECH'S PERFORMANCE MEASUREMENTS FOR OPERATIONS SUPPORT SYSTEMS

What Ameritech Measures/Reports	Source of Ameritech's Performance Obligation	Approved by Michigan Public Service Commission	Consistent with Justice Department's Views
(1) OSS timeliness (percentage of transactions completed on time for pre-ordering, ordering, maintenance/repair, and billing)	A T & T Agreement, § 10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. <u>See</u> Friduss Aff., ¶61 (citing, as important measures of pre-ordering timeliness, "Pre-order BOC Service Center Response Time" and "BOC OSS Response Time" for various items, and noting that such measures are proposed by Ameritech); <u>id.</u> , ¶62 (citing, as important measures of ordering timeliness, "Firm Order Response Time" (including FOCs and jeopardy, rejection, and completion notices), and noting that Firm Order Response Time measures are provided by Ameritech). In addition, Ameritech's "OSS Functions Cycle Time" Report, which disaggregates cycle times for each interface, was appended to Mr. Friduss's affidavit as an exemplar.
(2) OSS reliability (percentage of failed transactions, incorrect responses, and unprovided transactions for pre-ordering, ordering, maintenance/repair, and billing)	A T & T Agreement, § 10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. <u>See</u> Friduss Aff., ¶62 (noting that "Ordering Reliability is measured by the accuracy of the service order" and stating that "typical ordering performance measures . . . include [FOC and order jeopardy, rejection, and completion notices]," as proposed by Ameritech). In addition, Ameritech's "OSS Platform Reliability" Report, which disaggregates the percentage of correctly processed transactions for each interface, was appended to Mr. Friduss's affidavit as an exemplar.
(3) OSS availability (percentage of time each interface is available)	A T & T Agreement, §10.13.2, Schedule 10.13.2	Yes. MPSC April 4 Order, p.5	Yes. Mr. Friduss does not discuss OSS availability other than to note that "Pre-order OSS Availability" are offered by SBC, perhaps because the importance of OSS availability is salutary. <u>See</u> Friduss Aff., ¶61. Ameritech's "OSS Platform Availability" Report, which disaggregates the percentage of availability time for each OSS interface, was appended to Mr. Friduss's affidavit s an exemplar.

PROPRIETARY EXHIBIT

Information Industry Services
350 North Orleans Street
Floor 3
Chicago IL 60654
Office 312 335 6532
Fax 312 335 2927



June 17, 1997

VIA FAX 810-204-0329 & US MAIL

FILE COPY

Mr. William Riggan
Central Region Vice President
Teleport Communications Group
1000 Town Center, Suite 150
Southfield, Michigan 48075

Dear Bill

This letter is to confirm our understanding of the interconnection trunking matters that we discussed on June 6 and June 12, including those referenced in your May 9 letter to me.

With reference to your May 9 letter:

1. We agree that Local and Toll groups will be combined. Orders have been issued, the conversion will be coordinated so there is no service impact and the orders will complete between late June and August 1.
2. We are establishing Local and/or Toll trunk groups directly between Ameritech end offices and TCG. Because each company provides its own transport facilities for its trunks and as agreed, we will each install the trunk groups as two-way but they will carry traffic as one-way groups rather than in both directions. We will continue to work with you to address the administrative, engineering and capital expense allocation issues that prevent us from utilizing these as two-way groups at this time.

We have jointly identified many candidate offices for direct trunking. We anticipate implementing most of these groups. The groups will be prioritized based on traffic volumes, tandem service levels and the need for tandem relief.

3. We are getting mixed signals from TCG on the interconnection architecture. Both you and Tom Schroeder, TCG Director from Staten Island agreed to establish trunking from each of the TCG POIs to each of the Ameritech Tandems. We are in agreement with this network architecture.

However, Bob Nichols, also with TCG in New York, advocated staying with the existing architecture or as stated at the May 22 meeting, a new architecture which we do not do for ourselves. We need clarification on the TCG position.

If we use the architecture of establishing trunk groups from each tandem to each TCG POI, then Ameritech will be able to treat the TCG POIs as we do our own end offices.

Mr. William Riggan
Page Two
June 17, 1997

That is, the first choice route is via direct end office trunk groups - originating Ameritech end office to TCG POI; the second choice is from the originating Ameritech end office to terminating TCG POI's tandem to the TCG POI; the third choice is from the originating Ameritech office to the originating office's tandem to the terminating TCG POI; and the fourth choice is from the originating end office to the originating end office's tandem then on the intermachine group to the terminating TCG POI's tandem to the TCG POI.

We can also preplan emergency reroutes to handle network disasters and/or severe overloads. By establishing trunking from each TCG POI to each Ameritech tandem, we will have a full range of options for these disaster recovery preplans. These reroutes would be instituted under the direction of the Ameritech and TCG Network Management Centers to improve call completions.

4. Ameritech will provide TCG examples of specific trunk group data that can be used in the regular service meetings. We will provide you with this report by June 23.
5. Ameritech has planned the transmission facilities to the Plymouth and Troy TCG POIs. When these transport facilities are completed, trunks will be established and traffic routed to these POIs. The phases associated with this network rearrangement as well as the timeline were presented at the May 22 joint planning meeting.

Additionally, you have agreed to identify any specific blocking situations you have observed. As we discussed, our traffic data indicates that there is no blocking of TCG traffic at this time.

As in the past, we look forward to furthering our relationship through continued joint planning sessions.

Sincerely,



Warren L. Mickens
Vice President
Customer Operations

bcc: Jim Smith
Ray Thomas
Paul Monti
Sue West

PROPRIETARY EXHIBIT

PROPRIETARY EXHIBIT

02/19/97 WED 09:44 FAX

FAX: 817 248 8945

0002

VERSION 3.0

NETWORK CONNECTIVITY

15

Fax: 810
424-2931
Jelly Throft
Tim HallFax'd 2/26/21
847 658-5752

ECN Connection Request Form

Complete the front portion of the form and submit to the Ameritech Resale Customer Service Office. Upon approval, the back portion will be completed and returned by an Ameritech representative. Router information is not required for dial-up connections. Allow four to six weeks for processing.

Business Partner Information

Company Name Brooks Fiber Communications
Address 2855 Oak Industrial Dr. NE
City Grand Rapids State MI Zip 49506

Contact Name LEON Hollowell
Title Operations Analyst
Phone 616-224-4317 Pager 616-680-2227

Engineer Name Leon Hollowell
Title Operations Analyst
Phone 616-224-4317 Pager 616-680-2227

Circuit Termination Location Company Name Brooks Fiber Communications
Address 2855 Oak Industrial Dr. NE
City Grand Rapids State MI Zip 49506

Router IP Address 198.252.224.1 02 Antich side
Subnet Mask 255.255.255.255

Message Server IP Address 131.187.253.33 > connect Direct
Subnet Mask 255.255.255.255

Connection Type (check one)

☐ T1☒ Frame Relay

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MAY - JUNE 1997 **AEBS CYCLE TIME**

	Total AEBS bills	Number Mailed Late	% Not On Time	Late by 1 day	Late by 2-3 days	Late by 4-6 days	Late by 7-10 days	Late by 11-14 days
May	33	25	75.8%	5	11	2	6	1
June	36	4	11.1%	4	0	0	0	0